**UNITED STATES DISTRICT COURT**
**DISTRICT OF MINNESOTA**

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LeMond Cycling, Inc.,
Plaintiff,
vs.
Trek Bicycle Corporation,
Defendant/Third-Party Plaintiff,
v.
Greg LeMond,
Third-Party Defendant

Case No. 08-CV-01010 (RHK/JSM)

**AFFIDAVIT OF ELIZABETH ANDREU**

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STATE OF MICHIGAN )
) ss.
COUNTY OF WAYNE )

I, Elizabeth Andreu, being first duly sworn upon oath, depose and state as follows:

1. My husband, Frankie Andreu, rode on a professional cycling team with Lance Armstrong from 1992 through 2000. After Frankie's retirement from professional cycling, he continued to work for the team as a race director for the domestic races through 2002. Because of Frankie's involvement, I spent a lot of time with the team and was able to observe the team's routines and practices. Through my frequent interactions with the team I acquired first-hand knowledge of the use of performance-enhancing drugs.

2. On or about July 30, 2001, I attended a dinner at Michele's in Villefranche, France with Lance and Kristin Armstrong, and their son Luke, Jose Luis Rubiera, and the Armstrongs' handyman and his wife, my husband, and our children.

3. An article had recently been printed about doping on the Motorola Pro Cycling Team and Lance Armstrong was trying to figure out what member of the team had spoken with the reporter. I heard Lance ask my husband whether it was him and Frankie said "Hell no it wasn't me. I wouldn't say anything."

4. Then I heard Lance say, "Fucking LeMond" and I asked what happened. Lance said, "the shit that he said about Ferrari". I asked what was wrong with what Greg LeMond had

said. Lance pointed at me and said "He fucking opened the door for EPO usage. That's ok I'm going to make one call to John Burke and fuck him over good."

5. I didn't tell Greg LeMond what Lance had said at that dinner until July 17, 2004 when I emailed Greg for the first time. A true and correct copy of the email I sent to Greg LeMond on July 17, 2004 is attached as Exhibit A.

6. I was not able to transfer voicemail messages on my phone from Stephanie McIlvain to a CD, so I personally transcribed the voicemails. A true and correct copy of the transcript of the voicemails is attached as Exhibit B.

FURTHER YOUR AFFIANT SAITH NOT.

Elizabeth Andreu

Subscribed and sworn to
before me this 4 day of June, 2009

Notary Public

DIANE M. FARRAR
NOTARY PUBLIC, STATE OF MI
COUNTY OF WAYNE
MY COMMISSION EXPIRES Sep 12, 2011
ACTING IN COUNTY OF Wayne